

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF TIFFANY R. ELLIS
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL**

I, Tiffany R. Ellis, declare:

1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in the States of Michigan and Illinois and duly admitted to practice before this Court, representing Plaintiffs in the above caption action. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Because the materials at issue were designated confidential by Uber, Plaintiffs filed the following under seal:

Document	Description	Designating Party
Portions of Joint Discovery Letter re: Privilege Log Disputes	References to documents marked Confidential	Uber
Portions of Declaration of T. Ellis ISO Joint Discovery Letter	References to documents marked Confidential	Uber
Ex. A to Ellis Declaration ISO Joint Discovery Letter	Document produced by Uber and marked Confidential	Uber
Ex. B to Ellis Declaration ISO Joint Discovery Letter	Chart created using privilege logs marked Confidential	Uber
Ex. C to Ellis Declaration ISO Joint Discovery Letter	Chart created using privilege logs marked Confidential	Uber

1	Declaration of S. Binnings ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber
2	Declaration of D. Kolta ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber
3	Declaration of M. Frangopoulos ISO Joint Discovery Letter	Contains information deemed confidential by Uber	Uber

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6 I declare under penalty of perjury under the laws of the United States of America that the

7 foregoing is true and correct.

8 Executed this 30th day of October 2024 in Detroit, Michigan.

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10 /s/ Tiffany R. Ellis

11 Tiffany Ellis

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